

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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ROADGET BUSINESS PTE. LTD., a private  
limited company organized in the country of  
Singapore,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS, AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON  
SCHEDULE A HERETO

Defendants.

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CIVIL ACTION NO. 1:23-cv-17036

Judge: Hon. Sara L. Ellis

**DEFENDANTS' OPPOSED MOTION TO DISMISS  
OR, ALTERNATIVELY, TO SEVER**

Defendants<sup>1</sup> hereby move this Court to dismiss Plaintiff's Complaint and/or sever for the following reasons:

1. Plaintiff's claims against Defendant Nos. 21, 22, 23, 25, and 26 should be dismissed for lack of personal jurisdiction.
2. Plaintiff's claims against Defendant Nos. 3, 9, 10, 13–19, 22, 23, 25, and 26 should be dismissed on the grounds of improper service of process.
3. Plaintiff's claims against all Defendants should be dismissed for failure to state a claim because Plaintiff has failed to allege facts sufficient to establish ownership of its copyright.

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<sup>1</sup> This motion is by Defendant Nos. 3, 4, 9, 10, 13-19, 21-23, 25, and 26 listed on Schedule A of the Complaint.

4. Plaintiff's claims against all Defendants for exemplary damages should be dismissed or stricken because such damages are not permitted under the Copyright Act.

5. Plaintiff's claims against all Defendants for enhanced statutory damages should be dismissed because the Complaint fails to adequately plead facts necessary to support that form of damages.

6. Plaintiff's claims against all Defendants should be severed into separate actions due to improper joinder, or, at a minimum, Plaintiff should have to show cause why the Defendants may be joined under Fed. R. Civ. P. 20.

In support of its motion, Defendants submit the accompanying brief.

**Local Rule 37.2 Certification**

On February 14, 2024, counsel for the parties met and conferred and counsel for Plaintiff opposes this motion.

Dated: February 15, 2024

Respectfully Submitted,

/s/ Christopher J. Fahy

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